



February 6, 2006

VIA ECFS

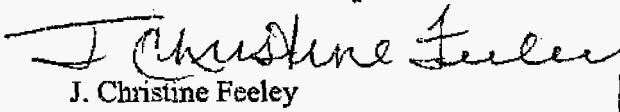
Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

Re: Commonwealth Telephone Company
Certification of CPNI Filing (2-6-06)
EB Docket No. 06-36
EB-06-TC-060

Dear Ms. Dortch:

Pursuant to the Public Notice issued by the Enforcement Bureau on January 30, 2006¹ and the Commission rules concerning telecommunications carriers' protection of the privacy of customer proprietary network information ("CPNI"),² Commonwealth Telephone Company submits the attached Compliance Statement and Certificate.

Respectfully submitted,


J. Christine Feeley
Vice President of Marketing

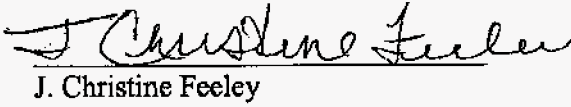
cc: Bryon McKoy via e-mail: byron.mccoy@fcc.gov
Best Copy and Printing via e-mail fcc@bcpiweb.com

¹ *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, Public Notice, DA 06-223 (rel. Jan. 30, 2006) ("Public Notice").

² 47 C.F.R. § 64.2001, *et seq.*

CERTIFICATION OF CPNI COMPLIANCE - 2006

I, J. Christine Feeley, hereby certify that I am an officer of Commonwealth Telephone Company with the title of Vice President of Marketing; that I am authorized to execute this certification as an agent for Commonwealth Telephone Company; and that based upon my personal knowledge, I certify that Commonwealth Telephone Company has established operating procedures, as described in the accompanying Statement, that are adequate to ensure compliance with the rules of the Federal Communications Commission set forth in 47 CFR §§ 64.2001 through 64.2009.


J. Christine Feeley
Vice President of Marketing

Executed on: February 6, 2006

COMMONWEALTH TELEPHONE COMPANY STATEMENT OF CPNI COMPLIANCE PROCEDURES

Every new customer that initiates service with Commonwealth Telephone Company ("CTCo") is notified of their rights regarding CPNI and offered the ability to "opt out" of marketing efforts that utilize CPNI. Their preference is recorded in the customer's account and thereafter customers who choose to opt-out are removed from all future marketing efforts. In addition, new customers receive a "welcome pack" detailing the services they have initiated with CTCo. This packet contains an additional notification of their CPNI rights. CTCo has scheduled a follow-up CPNI notification to its entire customer base for the first quarter of 2006.

Existing customers have been provided with an opportunity to opt-out and, as previously stated, new customers are notified of their rights as they initiate service. CTCo receives a customer's opt-out preference through the use of a toll free number available twenty four (24) hours a day, seven (7) days a week or through an email address dedicated to that purpose (also available twenty four (24) hours a day, seven (7) days a week).

CTCo does not sell or share its customer proprietary network information to suppliers, vendors or others for the purposes of marketing non-CTCo telecommunications or information services.

CTCo marketing efforts concentrate on communications-related products and services. In fourth quarter 2005, Commonwealth Telephone Company also began marketing a satellite television product on behalf of a third party. Marketing of this product does not utilize CPNI as it is marketed to CTCo's entire customer base utilizing only name, address, and telephone number. In addition, the customer is asked for permission to access their customer records at the initiation of every telemarketing call to obtain permission before marketing the product. All CTCo customers that "opted out" of the use of their CPNI are also removed from all marketing lists for this product.

When customers initiate contact with questions about products and services, CTCo representatives verify that the caller is the authorized customer on the account in question by confirming identity. The customer is then asked for permission to access the account records in order to appropriately address questions.

CTCo customer service representatives handling inbound or outbound telemarketing calls are trained on how to handle CPNI, and have written guidelines at their workstation as part of their "Call Guide." The training and guidelines both include the requirement that each customer service representative seek verbal permission to access customer account information from the customer of record on every inbound or outbound call. Even if a customer previously has not "opted-out" of marketing efforts using CPNI through the customer notification process, CTCo does not market to them if they do not give verbal permission to access their records at the initiation of a telemarketing call.

CTCo has implemented policies that require its employees to protect the confidentiality of CPNI. The policies restrict access to customer records, provide for employee training concerning the authorized and unauthorized use of CPNI, and require the confidentiality of customer records and CPNI. These confidentiality provisions also are outlined in an Employee Code of Ethical Conduct and Employee Code of Criminal Conduct. All employees must verify in writing that they have reviewed, understand and will comply with these policies. Each employee must execute this document on an annual basis evidencing that they have reviewed, understand and comply with these policies. In addition, a CPNI policy statement has been distributed to the CTCo marketing department to ensure compliance with the FCC's CPNI rules in marketing efforts. CTCo expects its employees and agents to act in accordance with all governing State and Federal laws, rules and regulations. As such, the Company has adopted policies, including the Code of Ethical Conduct and the Code of Criminal Conduct, which address but are not limited to instances of employee dishonesty, theft, or unauthorized access and or use of private or confidential information contained in the records of a customer of the Company. Any CTCo employees that violate the Code of Ethical Conduct and/or the Code of Criminal Conduct, including violations for the unauthorized use, sharing or disclosure of CPNI will be subject to disciplinary action, including suspension and possible termination of employment.

CTCo maintains a record of all sales and marketing campaigns that use CPNI. CTCo's marketing department maintains records of all outbound marketing campaigns for at least one year.

CTCo has established a procedure for supervisory review of all outbound marketing activities to ensure compliance with the FCC's rules governing CPNI. Each outbound marketing campaign conducted by CTCo is approved by CTCo's Vice President of Marketing.